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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

-----X	
JOHN DOE,	: Case No. _____
	:
Plaintiff,	:
	:
v.	: ORAL ARGUMENT REQUESTED
	:
PRINCETON UNIVERSITY,	:
	:
Defendant.	:
-----X	

**APPLICATION FOR A TEMPORARY RESTRAINING ORDER
AND INJUNCTIVE RELIEF**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1,
Plaintiff “John Doe”¹ (“Plaintiff”) hereby submits this Application for an Order to
Show Cause (“Application”) why a Temporary Restraining Order and Preliminary

¹ Plaintiff has filed a motion to proceed with the use of pseudonyms and for a protective order, contemporaneously herewith. Defendant Princeton University is aware of Plaintiff’s identity and has consented to the use of pseudonyms.

Injunction should not issue temporarily enjoining and restraining Defendant Princeton University (“Defendant” or “Princeton”) from enforcing its decision to expel Plaintiff, removing Plaintiff’s status as a full-time student, and preventing Plaintiff from attending classes and sitting for his upcoming exams pending resolution of the underlying merits. In support of this Application, Plaintiff incorporates by reference the Verified Complaint, filed contemporaneously herewith; the accompanying Memorandum of Law in Support of his Application; and, the declaration of Christian T. Becker, Esq., dated April 15, 2020, and all exhibits thereto.

Plaintiff respectfully submits that he has made a clear and specific showing of good and sufficient reasons why this matter cannot be resolved through normal motion procedures. *See* L.Civ.R. 65.1(a). Those reasons include the irreparable harm that Plaintiff is suffering and will continue to suffer absent a temporary restraining order and preliminary injunction. Plaintiff’s application is also supported by the Verified Complaint, verified in accordance with 28 U.S.C. § 1746. *See* ECF No. 1.

Dated: New York, New York
April 15, 2020

KASOWITZ BENSON TORRES LLP

By: /s/ Christian T. Becker
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